

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of ) CC Docket No. 92-24  
Southern New England Telephone Company )  
Tariff F.C.C. No. 39 ) Trans. Nos. 531, 533  
Line Information Database )

THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY  
REBUTTAL TO COMMENTS

The Southern New England Telephone Company (SNET) hereby submits this rebuttal pursuant to the Federal Communications Commission's (Commission's) Order designating issues for investigation.<sup>1</sup> This rebuttal responds to comments filed in the matter of the LECs' Line Information Database (LIDB) Direct Cases.

Comments filed by MCI, Sprint and Allnet address the issues discussed by the LECs in their respective Direct Cases. Comments filed by Comptel and ITI do not directly relate to the LECs' Direct Cases but address issues relating to the mutual card honoring agreements.

MCI is the only commenter to directly mention SNET in its comments. MCI's opposition primarily repeats comments raised in previously filed petitions against the LECs',

<sup>1</sup>In the Matter of Local Exchange Carrier Line Information Database, DA 92-347, CC Docket No. 92-24, Order Designating Issues For Investigation, released March 20, 1992, (Designation Order), and Order, released April 20, 1992, DA 92-495.

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including SNET's, tariff. SNET, in its reply comments,<sup>2</sup> has addressed MCI's oppositions to SNET's tariff filings and with this rebuttal, SNET will again provide a response to MCI's opposition.

I. Technical Data Describing LIDB Service Should Not Be Detailed In SNET's Tariff.

MCI believes that LECs have failed to justify the lack of detail in their tariffs describing LIDB service.<sup>3</sup> MCI proposes tariff language for the LECs' tariffs on pages 6 and 7 of its opposition. In general, SNET believes that its tariff includes sufficient terms and conditions, with appropriate technical references to adequately describe LIDB service.

The following is SNET's response to MCI's specific proposals for tariff language:

1. Explanation of Data Available In LIDB Database.

SNET's tariff provides sufficient explanation of the data that is available in the LIDB database. Section 17.2.2 of SNET's tariff provides a detailed discussion of the service interexchange carriers will receive and the terms and conditions under which LIDB Validation Service will be provided.

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<sup>2</sup> Reply Comments of the Southern New England Telephone Company filed January 7, 1992 regarding SNET Transmittal No. 531 and SNET's Reply Comments filed January 27, 1992 regarding SNET Transmittal No. 533.

<sup>3</sup>MCI Comments, p4.

As indicated on page 3 of SNET's Direct Case, the technical publications referenced in SNET's tariff define, in detail, the technical specifications of LIDB service. It is not necessary to duplicate that detail in the tariff. The Commission allows LECs to reference technical publications so that tariffs remain easy to use.

2. Identification of LECs in Database.

SNET does not believe that it is necessary to identify the LECs stored in its database, however, if the Commission directs the LECs to include this type of information in their tariffs, SNET will comply.

3. LIDB Database Updates.

As discussed in SNET's Direct Case, SNET maintains that keeping the database current and accurate is a priority. Should the Commission believe the wording by MCI to be essential to the tariff, SNET will include the language proposed by MCI in its tariff.

4. Emergency Updates.

SNET currently updates its database to reflect lost or stolen cards on a real time, on-line basis.

5. Point Of Contact.

SNET currently provides its LIDB customers with a single point of contact, 24 hours a day.

6. LIDB Downtime.

SNET's procedures for downtime are in accordance with all specifications required by the technical publications. Downtime is kept to a minimum as each database is part of a mated pair and at no time are both databases scheduled for downtime at the same time.

7. LIDB Performance Standards.

SNET believes that LIDB performance standards should be included in a technical publication, to which SNET's tariff makes reference.

8. Technical Publication Dates.

SNET agrees that the dates of the latest revisions of all referenced technical publications should be in the tariff.

9. Call Gapping Procedures.

Call gapping procedures are best outlined in a technical publication to which SNET's tariff makes reference. If the Commission directs that a description of call gapping should appear in the tariff, SNET has no objection to including wording similar to New York Telephone's tariff language.<sup>4</sup>

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<sup>4</sup>Tariff F.C.C. No. 1, Setion 21.4.2.

10. Fraud Prevention.

A description of SNET's fraud prevention system should not be in the tariff. See the discussion below which discusses SNET's on-going efforts to enhance fraud control measures.

II. SNET Is Continuing To Implement The Most Current Fraud Control Measures As They Become Available.

MCI contends that each LEC assume responsibility for calling card fraud arising from use of its LIDB database, 2) LECs should tariff fraud control mechanisms, and 3) LECs should calculate cost based LIDB query charges which would include additional costs to ensure fraud control.<sup>5</sup>

SNET will monitor calling card validation to detect and stop fraudulent calling card use on a daily basis, twenty four hours a day using its Database Administration Service (DBAS). SNET is committed to updating its LIDB database with additional anti-fraud features as soon as they become available. The current DBAS will be replaced with a new enhanced version planned for the second quarter of 1993. In addition, by the end of this year, SNET plans to implement a "fraud center" which will have the responsibility to communicate and coordinate closely with all interexchange carriers to control fraud. SNET believes that LECs' rates should reflect costs which are incurred to minimize fraud on behalf of its customers. SNET does not believe, however,

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<sup>5</sup>MCI Opposition, pp.17, 18.

that it is reasonable to impose liability on the LECs for fraudulent calling. SNET recommends that the LECs' liability be limited to the per query charge. In addition, SNET recommends that the most appropriate place for describing fraud control mechanisms is in a technical publication and not the tariff.

### III. SNET's Rates For LIDB Service Are Reasonable.

MCI's Opposition in the matter of LIDB rates is merely a repetition of its oppositions filed against the LECs' tariffs. SNET has filed extensive cost support in its tariff filings and has used the Common Channel Switching Cost Information System (CCSCIS) model<sup>6</sup> and Model for Incremental Cost and Revenue Analysis (MICRA) model. In none of the Exhibits to MCI's Opposition does SNET's investments, factors, or rates appear unreasonable but fall well within the average of the other filing LECs. In fact, MCI does not challenge SNET's rates or calculations of overhead loadings specifically in its opposition.

MCI claims that the LECs have not adequately described the differences between the CCS link and a 56 kbps Special Access line and that the tariffs should contain additional detail regarding the technical parameters for the CCS interconnection link.

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<sup>6</sup>The Bureau is currently reviewing this model as part of its ONA investigation.

SNET maintains that the actual facility (CCS interconnection link) is functionally equivalent to a 56 Kbps Special Access line and thus the rates for the STP link are the same as the effective rate for 56 Kbps service. SNET provides the option of provisioning the 56 kbps facility on a 1.544 Mbps facility, and the rates for that service are the same as the effective rates for a 1.544 Mbps facility.

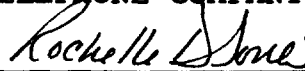
In regard to the technical parameters for the link, as SNET discusses above, each service in SNET's tariff makes reference to a technical publication which outlines the technical parameters. For example, the technical specifications for voice grade service are referenced in TR-TSY-000335 and PUB 41004 as indicated in SNET's tariff 39, Section 7.9.2. Certain technical specifications for Switched Access are referenced in TR-NWT-000334 as indicated in Section 6.1.5 of SNET's Tariff 39. Throughout the tariff technical publications are referenced. Clearly it is basic practice to reference these publications and continued reference in the tariff provides sufficient description of the technical parameters for the STP links.

IV. Conclusion.

SNET's rebuttal addresses MCI's opposition and reiterates that SNET's rates for LIDB service are reasonable. SNET is diligent in its fraud management initiatives and further contends that detailed descriptions of LIDB terms and conditions of service are best provided in a technical reference to which SNET's tariff makes reference.

Respectfully Submitted,  
THE SOUTHERN NEW ENGLAND  
TELEPHONE COMPANY

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June 15, 1992



CERTIFICATE OF SERVICE

I, Wendy S. Bluemling, hereby certify that SNET's Rebuttal has been filed this fifteenth day of June, 1992 to all parties listed on the service list attached.

Wendy S. Bluemling  
Wendy S. Bluemling

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